

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**NOTICE OF UNOPPOSED REQUEST TO  
REDACT OR FILE UNDER SEAL THE  
IDENTIFYING INFORMATION OF THE  
X CORP. AND RUMBLE DECLARANTS**

**Judge:** John A. Mendez

THE BABYLON BEE, LLC, et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

RUMBLE, INC., et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

X CORP.,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

NOTICE OF UNOPPOSED REQUEST TO  
REDACT OR FILE UNDER SEAL THE  
IDENTIFYING INFORMATION OF THE X  
CORP. AND RUMBLE DECLARANTS

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 5.2 and Civil  
3 Local Rules 140 and 141, on March 7, 2025—concurrent with filing this notice—Plaintiffs X Corp.  
4 and Rumble Inc. and Rumble Canada Inc. (collectively “Rumble”) have made a narrow Unopposed  
5 Request to Redact or File Under Seal the Identifying Information of the (i) X Corp. Strategy and  
6 Operations (“S&O”) Team Declarant in the S&O Team Declaration in Support of Plaintiffs’  
7 Motion for Summary Judgment Against AB 2655 (“X Corp. S&O Team Declaration”) and (ii)  
8 Rumble content moderator in the Rumble Declaration in Support of Plaintiffs’ Motion for Summary  
9 Judgment Against AB 2655 (“Rumble Declaration”), and have submitted the accompanying  
10 Declarations of Samantha Birkenfeld-Malpass and Stacey Beall in support of such request. The  
11 identifying information sought to be redacted is the X Corp. S&O Team Declarant’s and Rumble  
12 Declarant’s names, employment titles, and locations where the Declarations were executed.

13 If the identities of the X Corp. S&O Team Declarant and Rumble Declarant are made public  
14 in connection with this lawsuit, there is a serious risk that the Declarants will face threats,  
15 harassment, and an invasion of privacy. The non-redacted X Corp. S&O Team Declaration, non-  
16 redacted Rumble Declaration, proposed redacted X Corp. S&O Team Declaration, proposed  
17 redacted Rumble Declaration, Request to Redact or File Under Seal, Declaration of Samantha  
18 Birkenfeld-Malpass in Support of the Request to Redact or File Under Seal, Declaration of Stacey  
19 Beall in Support of the Request to Redact or File Under Seal, and Proposed Order Granting X  
20 Corp.’s and Rumble’s Request to Redact or File Under Seal, will be emailed to the proposed orders  
21 email box of the Honorable Judge Mendez, and will be served on all other parties, in accordance  
22 with Civil Local Rule 141(b).

23 Plaintiffs X Corp. and Rumble conferred with Defendants about this Request to Redact or  
24 Seal, and Defendants do not oppose it.

1 DATED: March 7, 2025

2 By: /s/ Joel Kurtzberg  
3 CAHILL GORDON & REINDEL LLP  
4 Joel Kurtzberg (admitted *pro hac vice*)  
5 Floyd Abrams (admitted *pro hac vice*)  
6 Jason Rozbruch (admitted *pro hac vice*)  
7 32 Old Slip  
8 New York, NY 10005  
9 Phone: 212-701-3120  
10 Facsimile: 212-269-5420  
11 jkurtzberg@cahill.com

12 DOWNEY BRAND LLP  
13 William R. Warne (SBN 141280)  
14 Meghan M. Baker (SBN 243765)  
15 621 Capitol Mall, 18th Floor  
16 Sacramento, CA 95814  
17 Phone: 916-444-1000  
18 Facsimile: 916-520-5910

19 *Attorneys for Plaintiff X Corp.*

20 /s/ Mathew W. Hoffmann  
21 ALLIANCE DEFENDING FREEDOM  
22 Mathew W. Hoffmann  
23 Philip A. Sechler  
24 44180 Riverside Parkway  
25 Lansdowne, VA 20176  
26 Phone: 571-707-4655  
27 Facsimile: 571-707-4656  
28 mhoffmann@ADFlegal.org  
psechler@ADFlegal.org

ALLIANCE DEFENDING FREEDOM  
Mercer Martin  
15100 N. 90th Street  
Scottsdale, AZ 85260  
Phone: 480-444-0020  
Facsimile: 480-444-0028  
mmartin@ADFlegal.org

CHAVEZ-OCHOA LAW OFFICES, INC.  
Brian R. Chavez-Ochoa (SBN 190289)  
4 Jean Street, Suite 4  
Valley Springs, CA 95252  
Phone: 209-772-3013  
brianr@chavezocholaw.com

*Attorneys for Plaintiffs Rumble Inc. and Rumble Canada Inc.*

NOTICE OF UNOPPOSED REQUEST TO  
REDACT OR FILE UNDER SEAL THE  
IDENTIFYING INFORMATION OF THE X  
CORP. AND RUMBLE DECLARANTS

**PROOF OF SERVICE**

I hereby certify that I caused to be filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record in this case.

Dated: March 7, 2025

By: /s/ Joel Kurtzberg  
CAHILL GORDON & REINDEL LLP  
Joel Kurtzberg (admitted *pro hac vice*)  
32 Old Slip  
New York, NY 10005  
Phone: 212-701-3120  
Facsimile: 212-269-5420  
jkurtzberg@cahill.com